



Privacy Policy

1 Purpose of this Policy

This policy explains how Penzance Tennis Club ('the Club', 'we', 'us') collect, uses, stores and protects personal information about members, visitors, volunteers, coaches and members of the public. We are committed to handling your data lawfully, fairly and transparently in accordance with the UK General Data Protection & the Data Protection Act 2018 (UK GDPR & DPA 2018), including amendments of the Data (Use and Access) Act 2025 (DUAA 2025).

The Club serves as the data controller for the purposes of the UK GDPR & DPA 2018 and the DUAA 2025. This means that we are responsible for deciding how we hold and use personal information about you. We are required under the above-mentioned data protection legislation to notify you of the information contained in this privacy policy.

If you have any questions about our use of your personal data, please contact the club office using the details set out in section 8 below.

The Club only accepts responsibility for compliance with the UK GDPR & DPA 2018 and the DUAA 2025 for the website of Penzance Tennis Club and social media of the Club (e.g. Facebook and Instagram). In relation to this please note that links on Penzance Tennis Club's website may take you to the external websites which are **not** hosted by Penzance Tennis Club. As we do not manage these websites, we do not know if they are fully compliant with the UK GDPR & DPA 2018 and the DUAA 2025. We therefore recommend that you check the privacy policies of any external website before submitting any personal information or personal data on these external websites. The Club will not be responsible for the content, function or data collection policies of any external website.

2 Who We Are

We are Penzance Tennis Club and our registered office is at Penzance Tennis Club, Penlee Park, Penzance, TR18 4HE. The Club is run by volunteers. Our designated Data Protection Lead is our Office Administrator who oversees compliance and acts as the main point of contact for data protection matters, see section 8 of this policy.

3 What Personal Data We Collect

We collect only the information necessary to operate as a community sports club. This may include:

3.1 Membership, Court bookings, Participation in coaching and tournaments and events

- Name, address, email, phone number
- Date of birth
- Emergency contact details
- Membership category and payment records
- Court booking information
- Coaching records (where applicable)

3.2 Website and Digital Communications

- Email addresses submitted through contact forms
- Newsletter subscriptions
- IP addresses and cookies, used for site functionality, analytics, and improving user experience. Users can manage cookie preferences through their browser settings
- Browser and device information.
- Photographs or videos taken at Club events (with appropriate consent)

3.3 Events, competitions and publicity

- Match and tournament results
- Team selections
- Photographs and filming for promotional use, only once consent is given

3.4 Volunteers, coaches, and committee members

- Contact details
- Role information
- DBS checks (where required)
- Training records

3.5 CCTV

CCTV footage is stored securely, retained for a limited period, and accessed only by authorised Committee members. Footage may be shared with law enforcement where legally required. CCTV footage relates to the following:

- Video images captured on the Club's premises for security and safety. No audio recording is used.
- Time and date of recordings
- Crime prevention and detection
- Safety of members and visitors
- Protection of Club property

3.6 Special category data

We do not routinely collect special category data, such as genetic or biometric data, philosophical, religious or political preferences and racial or ethnic origin.

However, we may process limited information

such as:

- Medical information, voluntarily provided for safe participation in competitions and/or social events organized by the Club.
- Injury reports or accident forms that happened at the Club for health and safety purposes.

3.7 Photography and Media

We may take photographs or videos at Club events for promotional use. We will:

- Seek consent where individuals are identifiable
- Provide opt-out options
- Avoid publishing images of children without explicit parental consent

In this regard we will follow the information that you provided on photography consent forms for specific events.

3.8 Children and Young People

For junior members, we collect:

- Parent/guardian contact details
- Emergency information
- Consent for participation and photography

We do not communicate directly with children under 16 without parental involvement.

4 How we use, process and share personal data

4.1 Data Usage and Processing

We use personal data for the following purposes:

- Administering membership and payments
- Managing court bookings and coaching sessions
- Communicating Club news, events, and operational updates
- Running competitions and publishing results
- Ensuring the safety and security of the premises (CCTV)
- Maintaining accurate records for governance and insurance
- Responding to enquiries via email or the website
- Complying with legal obligations (e.g., safeguarding, accident reporting, crime prevention)
- We do **not** sell personal data or use it for automated decision-making.

4.2 Lawful Basis for Processing

We rely on the following lawful bases:

- **Contract** – to administer membership and provide Club services and Club operations
- **Legal obligation** – safeguarding, accident reporting, financial records, crime prevention
- **Legitimate interests** – Club operations, security, event management, newsletters, club mailings
- **Consent** – photographs, medical information, LTA requirements/standards

Consent can be withdrawn at any time.

5 Retention, Sharing & Protection of Personal Data

5.1 Sharing your personal data

We may share your personal data with:

- National governing bodies (e.g., LTA) for competition or affiliation purposes
- Coaches delivering sessions on behalf of the Club
- Membership administration and the online Court Booking System
- Law enforcement (where legally required e.g. for safeguarding or crime prevention)

We do not transfer personal data outside the UK unless adequate safeguards are in place.

5.2 Retention of your Personal Data

We retain your personal data only for as long as necessary:

- Membership records: up to 6 years after membership ends
- Accident/incident reports: 3–6 years depending on age of the individual
- CCTV footage: 21 days unless required for investigation
- Financial records: 6 years
- Email enquiries: for as long as deemed necessary
- Photography and filming: until consent is withdrawn (usually at the end of a tennis event).

5.3 How We Protect Personal Data

We use appropriate technical and organisational measures, including:

- Secure password-protected systems
- Restricted access to personal data
- Encrypted storage where appropriate
- Regular review of data handling practices
- Volunteer training on data protection responsibilities

6 Your rights regarding your Personal Data

6.1 Your rights

Under UK GDPR, club members have the right to:

- Be informed about your personal data usage, processing and retention
- Access their personal data
- Request correction of inaccurate data
- Request deletion or to be forgotten when the original purpose for retaining your personal data does no longer apply, consent is withdrawn, incorrect use/processing of your personal data or where there is a legal requirement to delete your personal data
- You restrict or object to processing of your personal data
- You withdraw your consent for personal data usage, processing or sharing
- Request data portability
- Lodge a complaint with the **Information Commissioner's Office (ICO)**

6.2 Subject Access Requests (SARs)

Requests to access your personal data in relation to section 6.1 above can be made **in writing**.

We will respond **within one calendar month** and **free of charge**, unless the request is manifestly unfounded or excessive.

7 Changes to this Policy

This policy has been reviewed and updated on 9 June 2026. We may update this policy periodically.

The most recent version will always be available on the Club website or upon request.

8 Contact details

For questions, concerns, data requests or complaints in relation regarding your personal data usage and processing please contact us on:

Data Protection Lead

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Penlee Park
Penzance
Cornwall
TR18 4HE

Email: Info@penzancetennisclub.co.uk

Tel: 01736-367627